

EXHIBIT 9

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UNITED STATES DISTRICT COURT SOUTHERN
DISTRICT OF NEW YORK
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FRANKLIN BUONO,

PLAINTIFF,

-against- Case No.:
1:17-CV-05915-JFK

VICTORY AUTO STORE, INC., VICTORY AUTO
STORES, INC. D/b/a POSEIDON AIR SYSTEMS,
TYCO FIRE PRODUCTS LP, PAMELA L. SIMPERS,
PAMELA L. SIMPERS d/b/a VICTORY AUTO
STORES, BAUER COMP HOLDING GMBH, BAUER
KOMPRESSOREN GMBH and BAUER COMPRESSORS,
INC.,

DEFENDANTS.
-----X
TYCO FIRE PRODUCTS LP,

THIRD-PARTY PLAINTIFF,

-against-

O'PRANDY'S FIRE & SAFETY INC.,

THIRD-PARTY DEFENDANT.
-----X

DATE: September 12, 2019
TIME: 9:47 a.m.

(DEPOSITION of CURTIS N. HARDING.)

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DATE: September 12, 2019
TIME: 9:47 a.m.

VIDEOTAPED VIDEOCONFERENCED
DEPOSITION of the Defendant/Third-Party
Plaintiff, TYCO FIRE PRODUCTS LP, by a
witness, CURTIS N. HARDING, taken by the
respective parties, held at the offices of
Bay Reporting Service, Inc., 414 South
Jefferson Street, Green Bay, Wisconsin
54301, before Carrie S. Bohrer, RPR, RMR,
CRR.

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2 A P P E A R A N C E S

3

4 FINKELSTEIN & PARTNERS, LLP
Attorneys for the Plaintiff
5 1279 Route 300, P.O. Box 1111
Newburgh, New York 12551
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7 (Via videoconference)

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Third-Party Plaintiff
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11 Kansas City, Missouri 64108
BY: SARAH E. LYNN BALTZELL, ESQ.
12

13

HAWORTH, BARBER & GERSTMAN, LLC
14 Attorneys for the Third-Party Defendant
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15 45 Broadway, 21st Floor
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16 BY: TARA FAPPIANO, ESQ.
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17 (Via videoconference)

18

19 ALSO PRESENT:

20

MARK DENESSEN, Videographer

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**221. UNIFORM RULES FOR THE
CONDUCT OF DEPOSITIONS**

221.1 Objections at Depositions

(a) Objections in general. No objections shall be made at a deposition except those which, pursuant to subdivision (b), (c) or (d) of Rule 3115 of the Civil Practice Law and Rules, would be waived if not interposed, and except in compliance with subdivision (e) of such rule. All objections made at a deposition shall be noted by the officer before whom the deposition is taken, and the answer shall be given and the deposition shall proceed subject to the objections and to the right of a person to apply for appropriate relief pursuant to Article 31 of the CPLR.

(b) Speaking objections restricted. Every objection raised during a deposition shall be stated succinctly and framed so as not to suggest an answer to the deponent and, at the request of the questioning attorney, shall include a clear statement as to any defect in form or other basis of error or irregularity. Except to the extent permitted by CPLR Rule 3115 or by this rule, during the course of the examination persons in attendance shall not make statements or comments that interfere with the questioning.

221.2 Refusal to answer when objection is made A deponent shall answer all questions at a deposition, except (i) to preserve a privilege or right of confidentiality, (ii) to enforce a limitation set forth in an order of the court, or (iii) when the question is plainly improper and would, if answered, cause significant prejudice to any person. An attorney shall not direct a deponent not to answer except as provided in CPLR Rule 3115 or this subdivision. Any refusal to answer or direction not to answer shall be accompanied by a succinct and clear statement of the basis therefor. If the deponent does not answer a question, the examining party shall have the right to complete the remainder of the deposition.

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2 **221. UNIFORM RULES FOR THE**
3 **CONDUCT OF DEPOSITIONS**

4 **221.3 Communication with the deponent**

5 An attorney shall not interrupt the
6 deposition for the purpose of communicating
7 with the deponent unless all parties consent
8 or the communication is made for the purpose
9 of determining whether the question should
10 not be answered on the grounds set forth in
11 section 221.2 of these rules and, in such
12 event, the reason for the communication
13 shall be stated for the record succinctly
14 and clearly.

15 IT IS FURTHER STIPULATED
16 AND AGREED that the transcript may be
17 signed before any Notary Public with the
18 same force and effect as if signed before a
19 clerk or a Judge of the court.

20 IT IS FURTHER STIPULATED AND AGREED
21 that the examination before trial may be
22 utilized for all purposes as provided by
23 the CPLR.

24 IT IS FURTHER STIPULATED AND AGREED
25 that all rights provided to all parties by
26 the CPLR cannot be deemed waived and the
27 appropriate sections of the CPLR shall be
28 controlling with respect hereto.

29 IT IS FURTHER STIPULATED AND AGREED
30 by and between the attorneys for the
31 respective parties hereto that a copy of
32 this examination shall be furnished,
33 without charge, to the attorneys
34 representing the witness testifying herein.

1 C. HARDING

2 THE VIDEOGRAPHER: We're on the
3 record with the start of Media Unit
4 Number 1 in the deposition of Curt
5 Harding for Case Number
6 1:17-CV-05915-JFK, United States
7 District Court, Southern District of
8 New York. We're at Bay Reporting
9 Service, Green Bay, Wisconsin. It's
10 September 12th, 2019. The time is
11 approximately 9:47 a.m.

12 The court reporter will now
13 swear in the witness and then we'll
14 begin.

15 C U R T I S N. H A R D I N G, called as
16 a witness herein, having been first duly
17 sworn/affirmed, was examined and testified
18 as follows:

19 EXAMINATION BY

20 MR. FROMSON:

21 Q. Good morning, Mr. Harding. How
22 are you, sir?

23 A. Good. Thank you.

24 Q. My name is Ken Fromson. I
25 represent Franklin Buono related to an

1 C. HARDING

2 event that took place back on February 12th
3 of 2016 and which involved a fire
4 suppression system tank that exploded. So
5 I understand you're here to give some
6 testimony today of -- about the tank, its
7 instruction manuals, some general topics.
8 I would ask that you keep your answers
9 verbal so that our court reporter can
10 obviously more easily take down what you
11 say as opposed to a shrug of the shoulders
12 or nod of the head. Let me finish my
13 question before you answer it so that we're
14 not talking over each other. If you don't
15 understand a question, you just let me
16 know; I will accommodate you and try to
17 rephrase it in a way that we can all
18 understand each other. Fair enough?

19 A. Fair enough.

20 Q. All right. So for the record,
21 can you state your full name?

22 A. Curtis Harding.

23 Q. And what's your residential
24 address?

25 A. N2387 Rivers Edge Drive,

1 C. HARDING

2 Marinette, Wisconsin.

3 Q. And what is your age?

4 A. 46.

5 Q. And what do you do for a
6 living?

7 A. Technical support.

8 Q. And for whom do you work?

9 A. Pardon me?

10 Q. For whom do you work? Who is
11 your boss?

12 A. Corey Polzin.

13 Q. And for what company do you
14 work?

15 A. Johnson Controls.

16 Q. What's your general
17 understanding of the relationship between
18 Johnson Controls and Tyco Fire Products,
19 the defendant in the case?

20 A. Johnson Controls had purchased
21 Tyco.

22 Q. And what do you do in the
23 context of technical support?

24 A. I support the pre-engineered
25 products that we manufacture.

1 C. HARDING

2 Q. And what kind of products
3 generally do you manufacture so that you're
4 providing the support?

5 A. Dry chemical products and wet
6 chemical products.

7 Q. Are these generally in the
8 context of fire suppression systems?

9 A. Yes.

10 Q. What's your general
11 understanding as to why you're here today?

12 A. I'm here because I was deposed
13 for a case in which somebody was injured.

14 Q. To prepare for certain subject
15 matter topics related to the fire
16 suppression tank involving Mr. Buono's
17 event, did you take any steps or action to
18 review documents and prepare?

19 A. Yes, I did.

20 Q. And generally speaking what did
21 you review? I'm not asking you for a line
22 listing, but give us a general education as
23 to what you did and what you reviewed.

24 A. There were drawings, manuals.
25 That's pretty much it.

1 C. HARDING

2 Q. And in terms of the drawings
3 and manuals, do these date back or come
4 from the Pyro-Chem fire suppression system
5 and the subject test tank that was involved
6 in the event in February 2016?

7 A. What I saw was part of the fire
8 suppression system. I believe there was
9 some for the test tank as well.

10 Q. What I want to do, want to make
11 sure we're both talking about the same tank
12 involved in Mr. Buono's event, so I want to
13 learn from you what you believe is the
14 identified product that was involved in his
15 injury. What's your understanding?

16 A. Of what tank it was?

17 Q. Yes, sir.

18 A. My understanding is it was a
19 PCL-240.

20 Q. And in terms of the acronym or
21 abbreviation "PCL," just educate us, what
22 does that stand for?

23 A. I'm not 100 percent, but I
24 believe it stands for Pyro-Chem liquid.

25 2.4 --

1 C. HARDING

2 Q. 240, what -- what -- I'm so
3 sorry. What I should have said before we
4 started is although we have fantastic
5 technology here today, we can't speak over
6 each other, and so I didn't hear the last
7 part of your answer. Can you repeat it?

8 A. 2.4 gallons.

9 Q. And when we reference 2.4
10 gallons, what was the intended material or
11 agent to be placed in a test tank such as a
12 PCL 240T?

13 A. That is the wet chemical agent.

14 Q. Once again, I'm so sorry. We
15 could not hear your answer. Can you repeat
16 it?

17 A. Wet chemical agent.

18 Q. So in terms of your
19 understanding, was an intended use of a 240
20 test tank, at least back in 2016, to
21 include charging the tank with a wet
22 chemical agent, in other words putting a
23 wet chemical agent in that tank?

24 A. No.

25 Q. So what was the intended use in

1 C. HARDING

2 terms of what was to go inside a 240 test
3 tank as of 2016, considering it had a
4 capacity of 2.4 gallons?

5 A. So we are talking 2016. A test
6 tank was used to satisfy authority's
7 requirements.

8 Q. Requirements for what?

9 A. For testing the system. The
10 piping integrity.

11 Q. And so what I'm trying to find
12 out is what was to be inside the 2.4
13 gallons so as to achieve the purpose of
14 testing the integrity of an overall fire
15 suppression system?

16 A. The authorities could use
17 compressed dry air or nitrogen.

18 Q. Are you familiar currently with
19 the term or use of the word "balloon
20 testing" in terms of satisfying those
21 requirements to test a suppression system?

22 A. I am.

23 Q. And could you just educate us
24 on what your understanding of the term
25 "balloon testing" is in that context? I

1 C. HARDING

2 want to make sure we're on the same page
3 when we use that word or words.

4 A. Okay. Balloon testing is a
5 term that comes from the authorities having
6 jurisdiction. That is their way to test
7 the piping of a fire suppression system.

8 Q. And so from a practical
9 standpoint, I'm trying to envision how an
10 individual takes a test tank, such as a
11 2.4-gallon test tank, to a restaurant,
12 let's say, and balloon tests that
13 restaurant's Kitchen Knight fire
14 suppression system. Using that as a
15 complete hypothetical, can you explain to
16 us what's generally done in terms of the
17 manner in which the test tank is used
18 either with air or nitrogen?

19 A. Being that's a AHJ requirement,
20 there are many ways that they can do that.
21 But generally speaking, they are using a
22 test tank to push the compressed dry air or
23 nitrogen through the system piping, and
24 then the balloons would be on the end of
25 the nozzles.

1 C. HARDING

2 Q. Now, I want to focus your
3 attention much further back in hindsight,
4 way earlier than 2016, to your knowledge of
5 the -- the 240 test tank coming out of its
6 manufacture and assembly back in 1998. Are
7 you with me?

8 A. I am.

9 Q. As of the time this test tank,
10 the one that was utilized ultimately by Mr.
11 Buono and his co-employee, as of the time
12 this product was manufactured and assembled
13 and left the doors of Pyro-Chem, was one of
14 the intended uses to be balloon tested?

15 A. I would make the assumption
16 that it was at that time, yes.

17 Q. So part of my deposition
18 questions down the line are going to be
19 about the -- the way in which Pyro-Chem and
20 Tyco informed individuals on the proper use
21 for that intended use. Are you with me?

22 A. I am.

23 Q. All right. But first let me
24 get to know you a little bit. So you told
25 me where you live, you told me your age,

1 C. HARDING

2 and you told me who you work for, Johnson
3 Control. Let me learn a little more. So
4 for how long have you been employed in
5 technical support by Johnson Control?

6 A. 16 years.

7 Q. And what's your educational
8 background?

9 A. Associate degree in fire
10 protection.

11 Q. And from what school did you
12 get that associate's degree in fire
13 protection?

14 A. Northeast Wisconsin Technical
15 College.

16 Q. Do you have any other vocation
17 outside of your position in technical
18 support with Johnson Control? Any other
19 job?

20 A. No.

21 Q. Do you volunteer as a first
22 responder in the context of firefighting?

23 A. I do not.

24 Q. Have you ever?

25 A. No.

1 C. HARDING

2 Q. Have you ever utilized a
3 Pyro-Chem 240 agent tank, ever?

4 A. Never.

5 Q. Have you ever utilized a
6 Pyro-Chem 240 test tank, ever?

7 A. Never.

8 Q. Same question. Have you ever
9 utilized a Pyro-Chem 300 tank, ever?

10 A. I have not.

11 Q. Have you ever utilized a
12 Pyro-Chem 300 test tank, ever?

13 A. No.

14 Q. Have you ever been trained on
15 the use of such tanks?

16 A. The training I have received is
17 on the fire suppression tank, not a test
18 tank.

19 Q. When you referenced that the
20 training you have received has been on a
21 fire suppression tank, can you clarify what
22 type of tank you're talking about?

23 A. Sure. There are several tanks
24 in a fire suppression system, and they are
25 full of liquid agent that are used for the

1 C. HARDING

2 purpose of suppressing a fire. It is a
3 component of the fire suppression system.

4 Q. Some of my questions might
5 seem, for lack of a better term, common
6 sense, or some might say stupid. So I
7 apologize if they appear that way --

8 A. Not at all.

9 Q. -- but I need to have a clear
10 record. So when you use the term
11 "component," what do you mean?

12 A. What I meant is there are
13 several components of a fire suppression
14 system, with a PCL-240 being one of them.

15 Q. As part of your review of
16 documents in this case, did you come across
17 and review the Kitchen Knight restaurant
18 fire suppression system technical manuals?

19 A. Yes.

20 Q. And did you review the manuals,
21 the technical manuals, for both a PCL-240
22 as well as a PCL-300?

23 A. Yes.

24 Q. Are the -- withdrawn. Are
25 there any distinctions or differences in

1 C. HARDING

2 the components, design, installation,
3 maintenance, or recharge, other than the
4 sizes being different?

5 A. Yes. There are different
6 nozzles, the valves are different, there's
7 slight differences in the components.

8 Q. Other than those distinctions,
9 is there any comparison to the way, the
10 method, in which a 240 as opposed to a 300
11 is recharged, or are the safety issues the
12 same?

13 A. They are recharged. I would
14 say very similar. There are some
15 differences but nothing -- nothing major.

16 Q. Can you reference your
17 attention to a -- to a technical manual
18 that's there at your deposition but for the
19 300 size.

20 A. Sure.

21 Q. And when you have it, I'll --
22 I'll ask you some questions about the
23 components.

24 A. Okay.

25 Q. Let me pull out my version as

1 C. HARDING

2 well. So I -- I appreciate -- give me one
3 moment. I have many different copies of
4 it, so let me find the one -- yeah. Let's
5 see. I'm looking at -- bear with me. I
6 appreciate -- hold on a minute.

7 A. Okay.

8 MR. FROMSON: You're saying 61?
9 Because I have one on 60.

10 MS. FAPPIANO: I have it at 61.

11 MR. FROMSON: Yeah. Okay.

12 Q. So I have a technical manual in
13 front of me. On the bottom right corner,
14 the last numbers are -- begin with 61.
15 What do you have in front of you?

16 A. The same thing.

17 Q. So if you could reference your
18 attention -- well, let me ask you this.
19 That particular technical manual, it's
20 dated October 1st, 2001. Do you know who
21 or what entity produced, in other words
22 wrote, drafted, and put out into the
23 marketplace, this technical manual?

24 A. In 2001 that would have been
25 Tyco.

1 C. HARDING

2 Q. Do you know if there exists a
3 version back from 1998 that would have went
4 out the proverbial door with the product as
5 it was put into the marketplace?

6 A. Could you repeat that?

7 Q. Sure. Let me ask it a
8 different way. To the best of your
9 knowledge, is the language in this
10 technical manual the same as the language
11 that would have existed when the product
12 first went into the marketplace back in
13 approximately 1998?

14 A. That would be a completely
15 different manual. This is the first
16 version of the Kitchen Knight II manual.

17 Q. So Bates Number 61 -- or I
18 should say document beginning with Number
19 61 was the first manual for a Pyro-Chem 300
20 fire suppression system?

21 A. Correct.

22 Q. Would this have been the manual
23 that was in place as of 2016?

24 A. I think there were revisions
25 since then to this manual.

1 C. HARDING

2 Q. Okay. Have you seen a more
3 recent technical manual than this one dated
4 October 1st, 2001 as it pertains to a -- a
5 300?

6 A. Yes.

7 MR. FROMSON: Let me go off the
8 record for a few minutes. All right?

9 THE VIDEOGRAPHER: We're off
10 the record. The time is 10:06 a.m.

11 (Discussion off the record.)

12 THE VIDEOGRAPHER: We're back
13 on the record. The time is 10:12
14 a.m.

15 Q. Can you put in front of you the
16 technical manual for a Kitchen Knight
17 Restaurant Fire Suppression System that
18 encompasses the 240, and that would be
19 starting with a Document Number 1. Let me
20 know when you have that in front of you.

21 A. I have that.

22 Q. All right. Now, as part of the
23 overall fire suppression system, is a test
24 tank part of the system or not?

25 A. It is not.

1 C. HARDING

2 Q. I understand the use -- or the
3 intended use of the test tank was what you
4 already explained. How does someone who
5 buys a fire suppression system get
6 information as to the existence of a test
7 tank to test the fire suppression system?

8 A. For a PCL-240, --

9 Q. Yes.

10 A. -- I believe that was on the
11 price list.

12 Q. Is there anything in the
13 maintenance section of the technical manual
14 that informs a consumer about the use of a
15 test tank to test the integrity of the
16 piping as you described?

17 A. There is not.

18 Q. Are you familiar with the
19 training to be done by individuals who are
20 to install the Kitchen Knight fire
21 suppression system?

22 A. Yes.

23 Q. And are you familiar with the
24 certification training classes offered?

25 A. I am.

1 C. HARDING

2 Q. Can you -- are you prepared to
3 tell me about the history of those in terms
4 of when the defendant began providing
5 certified training classes? By example, I
6 don't know if they were giving any since
7 2001 or earlier or later. Do you know?

8 A. I do not know.

9 Q. I'm going to ask you just a --
10 some questions limited to the training
11 classes. So bear with me for a moment.

12 A. Okay.

13 Q. At least that gives you the
14 context. Do you know why Tyco Fire
15 Products was indicating in the technical
16 manual the necessity to have factory
17 certification training and become
18 certified?

19 A. Yes. It's part of being an
20 authorized distributor. They need to
21 receive training.

22 Q. And I understand that's part of
23 becoming an authorized distributor. Why
24 was it important to receive training?

25 A. I'm sorry, was that a question?

1 C. HARDING

2 Q. Yes. Can you have the reporter
3 read it back, please?

4 (Requested portion of record
5 read.)

6 A. Training's important for the
7 fire suppression system regarding design,
8 installation, and maintenance of it.

9 Q. When we reference the term
10 "maintenance," what would maintenance
11 include? Does it include testing the
12 integrity of the piping?

13 A. Every six months there is
14 maintenance required, and I don't believe
15 it's in the manual as far as integrity
16 testing.

17 Q. Was integrity testing an
18 important part of maintenance to ensure the
19 integrity of the piping?

20 A. That is required per the
21 authority. So I don't think --

22 Q. When you say "the authority,"
23 do you mean the municipality, like the
24 local fire code, the things of that nature?

25 A. It's an individual, the

1 C. HARDING

2 authority having jurisdiction, whoever that
3 may be.

4 Q. All right. So let me ask you a
5 general question. Are there any pre
6 requirements in order for someone to attend
7 the training?

8 A. They have to be --

9 Q. Let me actually -- let me
10 rephrase that. My questions are before
11 2016. Okay? Because my client's incident
12 happened in 2016. So reference that time
13 frame in your mind, before then. All
14 right? What if any requirements were
15 there, what prerequisites were there, for
16 someone to attend the defendant's certified
17 training class?

18 A. The only prerequisite that I
19 would know is they would have to be an
20 authorized distributor. So there would be
21 a contractual agreement before training.

22 Q. What types of training
23 materials or workbooks or presentations
24 were utilized for the training?

25 A. What they would receive is a --

1 C. HARDING

2 a manual such as the one that we're looking
3 at now. And that's -- that's the
4 information they receive for training.

5 Q. So in other words, the manual
6 itself would be the totality of the
7 materials provided for the training?

8 A. It would be a large percentage
9 of it. There may be some data spec sheets
10 in there or cut sheets on products. But
11 the majority of the training material is
12 the manual.

13 Q. As far as the -- the topics or
14 subject matter from within such training,
15 what information related to dangers from
16 unintended uses were provided?

17 MS. BALTZELL: And let me just
18 object real quickly to make sure
19 we're all on the same page. What
20 time period are you talking about for
21 training and on what product are you
22 talking about for training of a --
23 training of what?

24 MR. FROMSON: Well, that's
25 fair. Let me rephrase.

1 C. HARDING

2 Q. As far as the factory
3 certification training classes were
4 concerned, did any of those factory
5 certification training classes encompass
6 the subject matter of utilizing a test
7 tank?

8 A. No.

9 Q. Did the defendant offer any
10 type of other factory certification
11 training classes in the context of test
12 tanks separate and apart from the fire
13 suppression system classes that we're
14 discussing?

15 A. Did I re -- did I give any
16 additional training? Is that what you're
17 asking?

18 Q. Not you, sir.

19 A. Oh.

20 Q. But generally the -- were there
21 any such factory certification training
22 classes provided by the defendant, before
23 2016, were they available, but in the
24 context of use of the test tank?

25 A. I am not aware of any.

1 C. HARDING

2 Q. And I appreciate that you might
3 not be aware of any. Are you the person
4 that would know if there had been? Or is
5 it someone else's job to know that?

6 A. No. We looked back and there
7 was never any training on test tanks.

8 Q. In your industry, when you
9 utilize the term recharge of a tank, can
10 you just tell us what that means?

11 A. Referring to the fire
12 suppression system, recharge of a tank is
13 when you refill it with agent, wet chemical
14 agent, and nitrogen.

15 Q. Have you ever heard in your
16 industry people discuss recharging of a
17 tank to include recharging it with air,
18 compressed air, or nitrogen?

19 A. Typically I don't get into
20 those discussions. I don't hear much about
21 that. Because it doesn't relate to the
22 fire suppression side of it.

23 Q. When you say typically that you
24 don't hear about it because it doesn't
25 relate to the fire suppression system side

1 C. HARDING

2 of it, then in what context do you hear
3 about it, even though it might be uncommon?

4 A. Well, I know it's done. But
5 it's not something that I support,
6 technically support.

7 Q. In terms of your understanding
8 that you know it's done, but don't support,
9 what is your understanding of the context
10 in which it has been done? In other words,
11 what has been the intended uses that you
12 knew about but might not have supported?

13 A. Well, I know it's done because
14 we sell the test tank per a -- an
15 authority's request. So how they do that
16 is -- is not something that I discuss with
17 them. That would be on the authority's
18 side.

19 Q. And as far as the test tanks,
20 such as the test tank that was involved in
21 Mr. Buono's event, that was a test tank
22 that was put out into the market by the
23 defendant; yes?

24 A. Yes.

25 Q. And in terms of it being placed

1 C. HARDING

2 out into the market, the test tank, did it
3 include any instruction manual when it
4 essentially left the proverbial door of the
5 defendant's possession, custody, or
6 control?

7 A. I would have to say no. That
8 goes back quite a ways to the late '90s.

9 Q. Why do you believe no in part
10 because of the time frame?

11 A. I say no because it's not
12 something we do today.

13 Q. For what purpose today is a
14 test tank sold? In other words, what's the
15 intended use that the test tanks are sold
16 today?

17 A. I believe the intended purpose
18 of a test tank today is for the puff test
19 which we talked about earlier.

20 Q. Did you say puff test?

21 A. Yes.

22 Q. Synonymous with balloon
23 testing?

24 A. Yes.

25 Q. Yes?

1 C. HARDING

2 A. Yes.

3 Q. And so before 2016, did the
4 defendant have an understanding as to that
5 being a use of test tanks, in other words
6 puff tests or balloon tests?

7 A. Yes.

8 Q. And did the defendant have an
9 understanding before 2016 that the use of a
10 test tank such as the one Mr. Buono was
11 involved with for purposes of balloon
12 testing or puff testing was being done by
13 test tanks placed into the market by
14 Defendant?

15 A. Yes.

16 Q. And before 2016 but after 1998,
17 did Defendant ever send out a manual to
18 accompany the test tanks as they were sold
19 into the marketplace? I understand it
20 might not -- I'm not -- let me withdraw
21 that completely.

22 Putting aside the test tank in
23 this case that went out the door in 1998,
24 did there ever come a time that manuals
25 accompanied the test tanks but before 2016?

1 C. HARDING

2 A. I don't believe so. I have
3 never seen a manual on a test tank, and we
4 went back and looked and never saw any
5 information on manuals for test tanks.

6 Q. The test tank in this case, in
7 which Mr. Buono was involved with, is it
8 your understanding that it had a PSA marked
9 -- psi marking of 225?

10 A. I believe there was a DOT stamp
11 on it of 225.

12 Q. And in terms of your
13 understanding, what does that 225 psi mean
14 to a consumer?

15 A. It's a DOT stamping, and I'm
16 not completely up to speed on DOT
17 stampings, but the 225 does signify the
18 pressure.

19 Q. Did the Defendant -- and when I
20 say "the Defendant," I understand you're
21 here on behalf of the Defendant.

22 Did the Defendant have an
23 understanding as to the inherent dangers of
24 putting compressed air into a test tank?

25 MS. BALTZELL: Object to form

1 C. HARDING

2 and foundation. Go ahead.

3 Q. I'll ask it in a different way
4 because there's an objection as to form.

5 Are you aware of the -- of the
6 inherent danger of refilling a tank such as
7 a 2.4-gallon tank with compressed air?

8 MS. BALTZELL: Objection. Form
9 and foundation.

10 A. Yes.

11 Q. Let me move the volume for a
12 second. Would you repeat your answer for
13 us? Because we didn't hear you.

14 A. I said yes.

15 Q. Thank you. And generally
16 speaking, what is your understanding of the
17 inherent dangers of refilling a tank with
18 compressed air?

19 A. Well, it's just compressed air,
20 so if you -- if there's too much pressure,
21 that would be the danger in itself.

22 Q. And so are the dangers of
23 compressed air -- and particular -- such as
24 overpressurization, are those dangers any
25 different today than they were in 2016 --

1 C. HARDING

2 than they were in 1998, or is it
3 essentially conceptually the same inherent
4 danger?

5 MS. BALTZELL: Object to the
6 form and also object as we're off
7 topic. I don't think inherent
8 dangers of a test tank is one of the
9 topics.

10 MS. FAPPIANO: Can you --

11 MR. FROMSON: Yeah, we're
12 having volume issues here. Give us a
13 minute to see if we can fix it.
14 Okay? And we'll go off the record.

15 THE VIDEOGRAPHER: We're off
16 the record. The time is 10:29 a.m.

17 (Discussion off the record.)

18 (Requested portion of record
19 read.)

20 THE VIDEOGRAPHER: We are back
21 on the record. The time is 10:31
22 a.m.

23 MR. FROMSON: All right. So
24 I'll withdraw the last question.

25 Q. Overpressurization can lead to

1 C. HARDING

2 the tank exploding. Yes?

3 MS. BALTZELL: Object as
4 outside the scope of the deposition
5 topics. And its foundation.

6 MR. FROMSON: Well, I'm not --

7 MS. BALTZELL: What topic are
8 you on?

9 MR. FROMSON: Well, I'll tell
10 you, I'll pull -- I'm sure it's
11 within the technical manual not to
12 overpressurize a tank. I didn't
13 think I was asking something so off
14 base. However, give me a moment and
15 I'll find the topic that pertains to
16 it.

17 So he's here to talk about the
18 technical manual, right, which
19 includes design, installation,
20 maintenance, and use, is he not?

21 MS. BALTZELL: He is, but I do
22 believe he's testified that there is
23 not a technical manual that's
24 applicable to our product, our test
25 tank.

1 C. HARDING

2 MR. FROMSON: Right, and I'm
3 not asking about a test tank. My
4 question didn't say test tank. It
5 was really just is there an inherent
6 danger with overpressurizing a tank,
7 and that just -- I think that's
8 common sense. I don't think I'm
9 going far afield.

10 MS. BALTZELL: And I'll --
11 yeah, I'll --

12 MR. FROMSON: I'll ask the
13 question again and you can have your
14 objection as to form.

15 MS. BALTZELL: Yeah, that
16 works.

17 MR. FROMSON: Okay?

18 MS. BALTZELL: That works.

19 MR. FROMSON: All right.

20 Q. So do you have an understanding
21 that overpressurization of a tank, such as
22 a tank utilized in a fire suppression
23 system, can lead to the tank exploding?

24 MS. BALTZELL: And object to
25 the form of the question as well as

1 C. HARDING

2 outside the scope of the topics for
3 this deponent for this deposition.

4 Q. You can answer.

5 A. Okay. I would have to assume
6 that it would be dangerous if you
7 overpressurize a tank, yes.

8 Q. Does overpressurization include
9 or exclude a test tank versus an agent
10 tank, or is it still the same inherent
11 danger if you overpressurize tanks?

12 A. I would say it's the same
13 inherent danger.

14 Q. Do you have an understanding as
15 to why there's been and was no manual that
16 accompanied test tanks --

17 A. I do not.

18 Q. -- such as the test tank --
19 sorry -- such as the test tank involving
20 Mr. Buono?

21 A. I do not.

22 Q. Do you have any -- do you have
23 an understanding as to whether that subject
24 matter has ever been discussed by the
25 defendant in terms of the decision-making

1 C. HARDING

2 process of whether to have a manual for a
3 test tank?

4 A. I do not.

5 Q. Have you made any search for
6 any such records related to whether there
7 are manuals for the test tank?

8 A. Yes.

9 Q. And did your search come up
10 with nothing?

11 A. That is correct. Nothing.

12 Q. And just to -- and just to make
13 sure I understand the diligence that you
14 utilized, what did you do?

15 A. We reached out internally to
16 groups within the company.

17 Q. In terms of the technical
18 manual for a fire suppression system that
19 would include a 300, do you have an
20 understanding that test tanks are listed as
21 the components within that technical
22 manual?

23 A. Yes.

24 Q. Do you have an understanding as
25 to why they're included as components in

1 C. HARDING

2 that technical manual?

3 A. I do not.

4 Q. Was that a subject matter that
5 you inquired about to prepare for this
6 deposition?

7 A. I did not inquire regarding why
8 the 300 is in that technical manual.

9 Q. In any event, as part of your
10 preparation for this deposition, did you
11 come across any information or documents
12 that would explain why it's included in the
13 manual for the 300 size?

14 A. I did not.

15 Q. And now, you're aware also that
16 the manual for the 240 is in a different --
17 is a different manual altogether, correct?

18 A. That is correct.

19 Q. And you -- do you have an
20 understanding that the component list
21 within the technical manual for the 240, it
22 does not include a reference to the test
23 tank, correct?

24 A. That is correct.

25 Q. Do you know why?

1 C. HARDING

2 A. I do not.

3 Q. Did you make any inquiry as to
4 find out why?

5 A. I did discuss internally, and I
6 did not receive any response as to why
7 that's in there.

8 Q. Did you come across any
9 documents that provided an answer to the
10 question?

11 A. I did not.

12 Q. Are you aware that the test
13 tank does appear on a sales list that's
14 been provided in the case?

15 A. Yes, I am.

16 Q. Or I should say a price list.
17 Have you seen the price list that includes
18 the test tank?

19 A. Yes.

20 Q. It references the test tank as
21 a component of the Kitchen Knight
22 suppression system, correct?

23 A. Correct.

24 Q. Do you have an understanding as
25 to whether the defendant put forward any

1 C. HARDING

2 documentation, and when I say documentation
3 I mean instructions or warnings or
4 information or pamphlets, to consumers of
5 test tanks before 2016 that indicated what
6 the defendant believed the intended uses
7 were for such test tanks? And when I say
8 test tanks, I'm talking about the type of
9 test tank utilized by Mr. Buono.

10 A. So you're asking why there was
11 not information put out for that test tank?
12 Is that correct?

13 Q. That's a separate question, but
14 you can answer that --

15 A. Okay.

16 Q. -- as well if you want.

17 A. Yeah, I don't know why
18 information was not put out regarding the
19 test tank.

20 Q. And just in terms of clarity,
21 because your question -- your answer was
22 that you don't know why information was not
23 provided about the test tank, do you know
24 why Defendant didn't provide documentation
25 that referenced what the intended use was

1 C. HARDING

2 of the test tank?

3 A. I do not.

4 MR. FROMSON: Curtis, I want to
5 thank you -- let me take another few
6 minutes. I might be done. I just
7 want to look over my list. Okay?

8 THE WITNESS: Sounds good.

9 MR. FROMSON: Before I pass the
10 witness, let me just take five
11 minutes. All right, Sarah?

12 MS. BALTZELL: Sure, that
13 sounds good.

14 THE VIDEOGRAPHER: We're off
15 the record. The time is 10:40 a.m.

16 (Recess held.)

17 THE VIDEOGRAPHER: We're back
18 on the record. The time is 10:43
19 a.m.

20 Q. So, Mr. Harding, I want to make
21 sure I'm -- I understand something
22 conceptually here. I have, as provided to
23 us in this case, the technical manuals for
24 the Pyro-Chem restaurant kitchen fire
25 suppression systems, including those that

1 C. HARDING

2 encompass the 240 size and the 300 size,
3 and you as well have seen those documents
4 in preparation for the deposition, correct?

5 A. Correct.

6 Q. And it's your understanding
7 that those technical manuals do not
8 encompass use or maintenance or
9 instructions pertaining to test tanks such
10 as a 240 test tank or a 300 test tank,
11 correct?

12 A. That is correct.

13 Q. And so how does the defendant
14 expect a consumer, before 2016, to know how
15 to maintain, use, and refill a test tank
16 such as the one that was used by Mr. Buono?

17 MS. BALTZELL: Object to the
18 foundation.

19 A. The test tanks are similar to
20 the fire suppression tank; it's just that
21 they are shipped empty. There's no liquid
22 agent inside it. So the concept would be
23 the same.

24 Q. To the best of your knowledge,
25 did the defendant ever attempt, before

1 C. HARDING

2 2016, in the context of instruction manuals
3 or any type of documentation, inform
4 consumers of test tanks of what you just
5 told us?

6 A. No.

7 MR. FROMSON: Okay. I'm going
8 to pass the witness. Thank you for
9 your time, Mr. Harding.

10 THE WITNESS: Thank you.

11 EXAMINATION BY

12 MS. FAPPIANO:

13 Q. Picking up on that very
14 quickly, and for the sake of completeness,
15 in our document production from the
16 defendants throughout this case, you've
17 actually received three separate manuals --

18 MS. FAPPIANO: And I'll give
19 you the Bates numbers if you need
20 them, Sarah.

21 Q. -- which pertain to the PCL-240
22 system. Have you seen that there's three
23 different versions of them in your
24 preparation for this deposition?

25 MS. BALTZELL: What are your

1 C. HARDING

2 Bates numbers so we can get them out?

3 MS. FAPPIANO: Sure. I'm happy
4 to do that. So -- and they're very
5 small, so bear with me. 1448, --

6 MS. BALTZELL: Okay. Hang on.

7 MS. FAPPIANO: -- and that is
8 technical manual for Kitchen Knight
9 Restaurant Fire Suppression System
10 PCL-240, and it's got a date on the
11 second page --

12 MS. BALTZELL: Are you talking
13 --

14 MS. FAPPIANO: -- of December
15 15, 1999.

16 MS. BALTZELL: Are you talking
17 about the ones that are encompassed
18 in the UL listing?

19 MS. FAPPIANO: I don't know.
20 I'm asking -- there's three different
21 versions here that have been
22 produced, and I'm going to be asking
23 the witness why and if there's a
24 distinction. So --

25 MS. BALTZELL: And I can speak

1 C. HARDING

2 to the why they were produced. I
3 don't -- the -- why they were
4 produced is because we provided you
5 the UL listings, and so the UL
6 listing starts on Page -- let me get
7 this right. And you'll see it has
8 ULEX on the bottom of most of the
9 numbers. Let me find it. It starts
10 at Page 1445. Everything from there
11 to the end is the UL listing. So as
12 to the why, if there are manuals that
13 happen to be in the UL listing, you
14 received them by virtue of them just
15 being in the UL listing, not because
16 it was a responsive manual to a
17 particular request. Does that help?

18 MS. FAPPIANO: Okay.

19 Q. So my -- my question is -- and
20 this is all I want to know. This
21 particular manual, however it was produced,
22 or for whatever reason it was maintained,
23 was this a manual that was put into
24 marketplace?

25 A. Yes.

1 C. HARDING

2 Q. Okay. And this manual does not
3 contain any information about the use or
4 the maintenance of the test tank that we've
5 been talking about; am I correct?

6 MS. BALTZELL: If you want to
7 look at it.

8 Q. This version?

9 A. You are correct.

10 Q. Okay. Thank you. There's a
11 second version, which I have here.

12 I'm doing this chronologically.
13 Maybe not, actually. It's at Bates 1557 of
14 -- which appears to have some differences
15 from the one that we just referenced. My
16 -- it's the same question I have. Was this
17 a manual that was put into the marketplace
18 that starts at Page 1557?

19 A. We're looking for that one
20 right now.

21 THE WITNESS: This is the one
22 here?

23 MS. BALTZELL: (Nods head up
24 and down.)

25 A. And your question was if it was

1 C. HARDING

2 put into the marketplace?

3 Q. That was my question, yes.

4 A. Yes.

5 Q. Okay. And am I correct that
6 this version of the manual also does not
7 contain any information about the use or
8 maintenance of the test tank that we've
9 been talking about?

10 A. That is correct.

11 Q. Thank you. Okay. And the
12 third version was the one that you were
13 questioned about by plaintiff's counsel,
14 which is the one that starts at 0001. And
15 is there any other distinct -- are there
16 any distinctions between these three
17 manuals that speak to the use of the test
18 tank in any way, shape, or form?

19 A. There is not.

20 Q. Okay. Thank you. In these --
21 the training classes that we talked about
22 earlier, those are provided to
23 distributors, correct?

24 A. Correct.

25 Q. And they were not provided to

1 C. HARDING

2 consumers or end users of your product; is
3 that correct?

4 A. That is correct.

5 Q. Besides -- were the
6 distributors given any type of materials to
7 distribute to the consumers to whom they
8 were selling that pertained to the test
9 tanks that we've been talking about?

10 A. No.

11 Q. Do you know for this particular
12 tank -- and I'm not sure if this is within
13 your area of expertise, so tell me if it is
14 not. Do you know to which distributor this
15 particular tank was sold?

16 A. I do not.

17 Q. Do you know into which
18 jurisdiction it was sold? We've been
19 talking about the jurisdiction of
20 authorities. Do you know where it went?

21 A. I do not.

22 Q. You spoke earlier about the
23 fact that -- and I believe you used the
24 language "do not support balloon testing."
25 I just want to clarify what you mean by "do

1 C. HARDING

2 not support."

3 Is it correct that that's not
4 really a reference to you morally or
5 ethically supporting something; that's just
6 technical support is not provided for
7 balloon testing; is that correct?

8 A. I was referring to technical
9 support, that is correct.

10 Q. Okay. And therefore, once a
11 test tank goes out the door, so to speak,
12 into the marketplace, is it accurate to
13 state that there is no technical support
14 provided for it by the company?

15 A. That is correct.

16 Q. Do you in your role have any
17 interaction with consumers or end users of
18 the product?

19 A. I do receive phone calls from
20 end users about our products. Occasionally
21 I do, yes.

22 Q. Okay. Are you familiar at all
23 with Oprandy's Fire & Equipment?

24 A. Only referring to this case.

25 Q. Give me one moment.

1 C. HARDING

2 MR. FROMSON: Do you want five
3 minutes? We're going to get done
4 with this deposition quite early
5 today.

6 MS. FAPPIANO: It's going to go
7 quickly; I just want to make sure
8 that I've covered what I need to.
9 Give me one second. I'm just going
10 to switch to a different document.
11 That's all.

12 Q. Okay. We talked about earlier
13 that there is on the price list, and I just
14 want to get onto the record that that's the
15 -- it starts at Bates Number 1371, a
16 listing for the tank -- the test tank as a
17 component part. Is that correct?

18 A. That is correct.

19 Q. Okay. And the date on this
20 price list is July 24th, 2000. Is that
21 correct?

22 A. That is correct.

23 Q. Are there any price lists for
24 prior to 2000 that you're aware of that
25 you've been able to find?

1 C. HARDING

2 A. I wasn't able to find any prior
3 to 2000.

4 Q. Do you know if this is -- do
5 you know if -- if this is the first price
6 list that was published, for lack of a
7 better word, for the Kitchen Knight
8 suppression system?

9 A. It may be. I'm -- I'm not 100
10 percent.

11 Q. Okay. What would be the
12 purpose of including the test tank as a
13 component on this price list?

14 A. The price lists are offered to
15 our distributors to purchase all of the
16 components that we offer.

17 Q. And why would a distributor
18 need to purchase a test tank such that it
19 would be listed on this sheet?

20 A. Because the authority having
21 jurisdiction is requesting it.

22 Q. And when you refer to the
23 authority having jurisdiction, that can be
24 things like fire departments; is that -- is
25 that accurate?

1 C. HARDING

2 A. Yes, could be a fire
3 department, could be an insurance carrier.

4 Q. Excuse me. I cut you off. I
5 apologize. I'll let you finish that
6 answer.

7 A. I said could be fire
8 department, it could be an insurance
9 carrier, whoever is in authority in that
10 area.

11 Q. Okay. Might that include
12 building inspectors?

13 A. I would think so.

14 Q. And fire inspectors?

15 A. Yes.

16 Q. Okay. And so it's -- was the
17 defendant, prior to 2016, aware that
18 distributors were selling the component
19 test tank to these authorities that you
20 just described?

21 MS. BALTZELL: Objection.
22 Foundation.

23 A. What I would believe is the
24 distributors would purchase the test tanks
25 and then they would own them, and they

1 C. HARDING

2 would not be resold to anybody else.

3 Q. Why would the distributors need
4 to own the test tank then? For what
5 purpose?

6 A. They are used as a tool. It's
7 something that they could reuse.

8 Q. For what reason?

9 A. For the --

10 Q. You would --

11 A. For the puff test or balloon
12 test that we had discussed earlier.

13 Q. Okay.

14 MR. FROMSON: That was known in
15 2016?

16 Q. And that was known in 2016
17 before this accident occurred; is that
18 correct?

19 A. Yes.

20 Q. Okay. You testified earlier,
21 and forgive me for paraphrasing, that you
22 did not know why Tyco, the defendant, did
23 not put out information pertaining to the
24 test tank; is that correct?

25 A. Correct.

1 C. HARDING

2 Q. Should they have put out
3 information pertaining to the test tank?

4 MS. BALTZELL: Objection to the
5 form.

6 A. That wouldn't be for me to
7 decide. That would be upper management's
8 decision.

9 Q. That would be a decision that
10 would be made by the defendant; is that
11 correct?

12 A. Correct.

13 MS. BALTZELL: I have nothing
14 further.

15 MR. FROMSON: I have just a
16 short line of questioning.

17 EXAMINATION BY

18 MR. FROMSON:

19 Q. I'd ask you to take a look at
20 the technical manual for the 240, which I
21 believe started at 1557, but I'm going to
22 reference your specific attention to Pages
23 1603 and 1604, which are part of the
24 Chapter V for System Maintenance. So let
25 me know when you get there.

1 C. HARDING

2 A. What page was that?

3 Q. It's Bate -- I apologize if I
4 got the number wrong. The bottom right
5 corner in small print, it says 1603.

6 A. I don't think I have the right
7 one, do I?

8 Q. And it's the November 1st, 1994
9 version.

10 MS. BALTZELL: We've got a few
11 copies of manuals running around, so
12 let me try to --

13 MR. FROMSON: I'll tell you
14 what.

15 MS. BALTZELL: Because his is
16 -- his is different.

17 Q. If you can -- if -- I've given
18 you an example now. If you can find
19 Chapter V, System Maintenance, of a 240
20 manual, let me know, you tell me the Bates
21 number that you have, and we'll go from
22 there.

23 MS. BALTZELL: There you go.
24 Do that.

25 A. Okay. I have System

1 C. HARDING

2 Maintenance, Page 59 and Page 60 on the
3 bottom right corner.

4 Q. So do you see -- is there a
5 section -- a subsection for piping and
6 nozzles?

7 A. Yes.

8 Q. And within that subsection of
9 piping and nozzles, does it essentially
10 state in sum and substance that as part of
11 the maintenance process, piping should be
12 flushed with warm water and blown out with
13 air or nitrogen?

14 A. Yes.

15 Q. And so before 2016, was that at
16 least part of the maintenance instructions
17 provided by Defendant as it pertained to
18 the Kitchen Knight fire suppression system?

19 A. Yes.

20 Q. With what component, if any, of
21 the fire suppression system, back in 2016,
22 was an individual to flush the piping with
23 warm water and then blow it out with air or
24 nitrogen, if any?

25 A. That would be followed by

1 C. HARDING

2 maintenance after a system discharge.

3 Q. I understand the context --

4 A. Okay.

5 Q. -- in terms of when it would be
6 done. My question is with what component,
7 if any, of a fire suppression system
8 offered by Kitchen Knight would an
9 individual flush the piping with either or
10 both warm water and then blow it out with
11 air or nitrogen?

12 A. That I don't know.

13 Q. Would it -- would it be a test
14 tank that would be utilized in terms of
15 doing a balloon test or a puff test to blow
16 out air from the test tank through the
17 piping?

18 A. It is possible, yes.

19 Q. Was this something that was
20 possible or known to -- to Defendant before
21 2016, that individuals were taking part in
22 the maintenance of the suppression system
23 such as blowing out the piping with air or
24 nitrogen in the context of the piping and
25 nozzles within the technical manual that

1 C. HARDING

2 we're discussing?

3 A. It may have been known, yes.

4 MR. FROMSON: That was my line
5 of questioning. Thank you so much.

6 THE WITNESS: Thank you.

7 MR. FROMSON: Anything else?

8 MS. FAPPIANO: I don't have
9 anything else.

10 MR. FROMSON: We are done.
11 Thank you so much for your time, sir.

12 THE WITNESS: Thank you.

13 THE VIDEOGRAPHER: This is the
14 end of the deposition of Curt Harding
15 on September 12th, 2019. We're off
16 the record at 11:04 a.m.

17 MR. FROMSON: So I'll take an
18 E-Tran again and I'll get back to you
19 on ordering the video. Okay?

20 THE COURT REPORTER: Okay.
21 Thank you. Tara, you're ordering as
22 well, the second one?

23 MS. FAPPIANO: Yes. Thank you.

24 MS. BALTZELL: Same. And we'll
25 read and sign.

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C. HARDING

(Whereupon, at 11:04 A.M., the
Examination of this witness was
concluded.)

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C. HARDING

D E C L A R A T I O N

I hereby certify that having been
first duly sworn to testify to the truth, I
gave the above testimony.

I FURTHER CERTIFY that the foregoing
transcript is a true and correct transcript
of the testimony given by me at the time
and place specified hereinbefore.

CURTIS N. HARDING

Subscribed and sworn to before me
this _____ day of _____ 20____.

NOTARY PUBLIC

1 C. HARDING

2 E X H I B I T S

3

4 EXHIBIT EXHIBIT PAGE

5 NUMBER DESCRIPTION

6 (None)

7

8 I N D E X

9

10 EXAMINATION BY PAGE

11 MR. FROMSON 6, 55

12 MS. FAPPIANO 44

13

14

15 INFORMATION AND/OR DOCUMENTS REQUESTED

16 INFORMATION AND/OR DOCUMENTS PAGE

17 (None)

18

19

20 QUESTIONS MARKED FOR RULINGS

21 PAGE LINE QUESTION

22 (None)

23

24

25

1 C. HARDING

2 C E R T I F I C A T E

3

4 STATE OF WISCONSIN)
5 : SS.:
6 COUNTY OF BROWN)

7

8 I, CARRIE S. BOHRER, a Notary Public
9 for and within the State of Wisconsin, do
10 hereby certify:

11 That the witness whose examination is
12 hereinbefore set forth was duly sworn and
13 that such examination is a true record of
14 the testimony given by that witness.

15 I further certify that I am not
16 related to any of the parties to this
17 action by blood or by marriage and that I
18 am in no way interested in the outcome of
19 this matter.

20 IN WITNESS WHEREOF, I have hereunto
21 set my hand this 18th day of September
22 2019.

23

24

25



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